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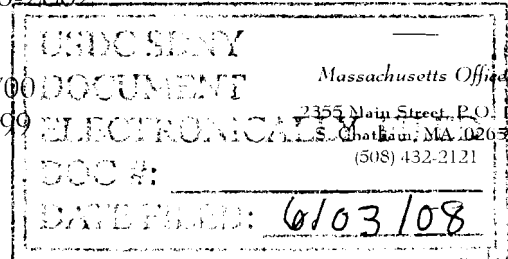
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May 29, 2008



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BY HAND DELIVERY

The Honorable Richard M. Berman
United States District Court
Southern District of New York
40 Centre Street, Room 650
New York, NY 10007

MEMO ENDORSED MAY 30 2008
fz

Re: Zim Integrated Shipping Services, Ltd. v. Belco Resources, Inc. et al.
Southern District of New York, 07 Civ. 5861 (RMB)(GWG)

Dear Judge Berman:

We represent plaintiff Zim Integrated Shipping Services, Ltd., in the above captioned matter. We respectfully request the authorization to file a two (2) page reply brief to address Defendant Sinochem Jiangsu Corporation's opposition to Zim's motion for reconsideration of the Decision & Order entered on May 5, 2008.

More precisely, in opposition to point III of Zim's motion brief, Defendant Sinochem Jiangsu Corporation intentionally modifies the question of law raised by Zim ("sanction for failure to give notice of intent to raise foreign law", *See Br. page 11*) into a distinct and irrelevant question ("sanction for failure to state claims under foreign law", *See Opp. Br. page 8*). We request the authorization to rebut Defendant Sinochem Jiangsu Corporation's attempt to mislead the Court.

Respectfully submitted,

[Signature]
Olivier D. L. DuPont

Letter to Judge Berman

May 29, 2008

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CC: Via e-mail

Lovells, LLP, *Attorneys for Sinochem Jiangsu Corporation.*

Bennett, Giuliano, McDonnell & Perrone, LLP, *Attorneys for Belco Resources, Inc.*

Tisdale Law Offices, LLC, *Attorneys for Nanjing Huabin Foreign Trade & Economics Co., Ltd.*

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Application Granted.	
Submit by 6/9/08.	
SO ORDERED:	<i>Richard M. Berman</i>
Date: 6/3/08	
Richard M. Berman, U.S.D.J.	